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Firm No. 412

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ANNA SZYMCZAK and CARYL CLEMENT,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No.: 07 C 6338
OHIO CASUALTY GROUP/WEST AMERICAN	)	
INSURANCE COMPANY,	)	Judge: Joan H. Lefkow
	)	
Defendant.	)	Magistrate Judge Valdez

**DEFENDANT'S MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 6(b)(1)**

Defendant, WEST AMERICAN INSURANCE COMPANY, ("West American"), by and through its attorneys, Bradley C. Nahrstadt and Christina D. Harrison of Williams, Montgomery & John Ltd., respectfully moves this Court to extend its time to answer or otherwise plead by thirty (30) days to December 15, 2007, pursuant to Federal Rule of Civil Procedure 6(b)(1). In support of its motion, Defendant states:

1. Plaintiff filed this matter in the Circuit Court of Cook County on October 2, 2007.
2. Plaintiff obtained service on West American's agent for service of process, Michael McRaith, the Illinois Director of Insurance, on October 9, 2007.
3. West American retained Williams Montgomery & John Ltd. as its counsel in this matter on October 25, 2007.
5. On November 8, 2007, West American filed a Notice of Removal removing this matter from the Circuit Court of Cook County to the United States District Court for the Northern District of Illinois.
6. Williams Montgomery & John Ltd. filed its appearance on behalf of West American before this Court on November 8, 2007.

7. Pursuant to Federal Rule of Civil Procedure 81(c), West American is permitted until November 15, 2007 to answer the Complaint or present other defenses or objections.

8. West American respectfully requests that this Court extend its time to answer or otherwise plead by thirty (30) days to December 15, 2007, pursuant to Federal Rule of Civil Procedure 6(b)(1).

9. There is good cause to permit this extension. Defendant's counsel needs time to investigate the allegations beyond the issue of removal before filing a responsive pleading.

WHEREFORE, Defendant respectfully requests that this Court grant its Motion to Extend Time to Answer or Otherwise Plead to December 15, 2007 pursuant to Federal Rule of Civil Procedure 6(b)(1).

Respectfully submitted,

WEST AMERICAN INSURANCE COMPANY

By: /s/ Christina D. Harrison  
Christina D. Harrison

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